

### REMARKS

The Applicant respectfully requests reconsideration. Claims 1-20 were previously pending in this application. By this amendment, claims 1, 2, 19 and 20 have been amended. No new claims have been added and no claims have been cancelled. As a result, claims 1-20 are pending for examination with claims 1, 2, 19 and 20 being independent claims. No new matter has been added.

#### Withdrawn Objections and Rejections

The withdrawal of the previous objections to claim 20 and rejections under 35 U.S.C. 112 and 103(a) are gratefully acknowledged.

#### Rejections under 35 U.S.C 103

The Examiner has rejected Claims 1-20 under 35 U.S.C 103(a) as being unpatentable over Davis (NPL, Application Development Methodology, Dec 1996, Pgs 1-20) in view of Labarge (US2002/0120604).

In response to the rejection, claims 1, 2, 19 and 20 have been amended to clarify that the attributes are external to, and independent of, the items but that they may be allocated to the items. These amendments are supported, *inter alia*, on Page 3 Line 33 – Page 4 Line 4 of the application.

The amendments are made without prejudice or admission, as an expedient to advancing the application towards allowance and it is hereby noted that the Applicant respectfully disagrees with the Examiner's rejection of the original claims. However, the discussion below refers to the claims as amended in the present submission. The Examiner's specific objections will now be discussed in more detail.

Claims 1-20

The amended claims are allowable over Davis in view of Labarge.

*Independent Claim 1*

As recognized by the Examiner, Davis does not teach providing a filtering mechanism associated with the attributes.

To move from the tables disclosed in Davis to the invention presently claimed requires a large number of steps, many of which would in themselves require inventive ingenuity. It is only with the benefit of impermissible hindsight that the Examiner has been able to link together two selected documents and extract from these references elements having some similarity to the Applicant's invention.

The Davis matrix seems to be purely a method of presentation, with no mention anywhere of any user input or interaction with the diagrams. In particular, Davis does not teach any form of filtering, presumably because it is not considered useful in the context of the Davis diagrams. The processes listed in Davis are small in number, and would normally all be visible at the same time. Therefore, there would be no motivation for the skilled person to apply any form of filtering to the Davis system and it would certainly not be obvious to do this. The purpose of Davis seems to be to display information efficiently and the document does not envisage any form of user interaction with the displayed data.

Even if the user did decide to implement a filtering system and, for a reason that the Examiner has not explained, selected the filtering system of Labarge, it would not be obvious how to apply this filter to the disclosure of Davis. The items disclosed in Davis are not listed in tabular form, so the filtering disclosed in Labarge in which items are selected one by one in their table rows could not be applied directly to the Davis disclosure.

Even if the skilled person did attempt to combine the filtering elements of Labarge with the tables disclosed in Davis, this would not lead the skilled person to the claimed invention. In particular, Labarge teaches enabling a user to select which items are included or excluded from the filtering process using a check-box next to each item. This is not the same as the claimed system of providing a filter option indicator associated with each attribute, which may enable a user to select whether to filter on a particular attribute. Hence if the system of Labarge were applied to Davis, the user might be able to select whether or not a particular item appears in a matrix, but would not be able to filter a group of items based on a filter option indicator associated with an attribute of those items. Rather, Labarge would lead the skilled person to implement a separate filter box, as illustrated in Fig. 3a, with a complex system of drop-down menus for filtering the items.

Therefore, to use the filtering system of Labarge effectively, not only would the skilled person have to take the inventive step of applying the filtering system from Labarge to Davis, but the skilled person would also have to change the filtering system disclosed in Labarge to enable attributes, rather than individual items, to be filtered. This is recognised by the Examiner on Page 3 of the Office Action report. Below, we quote from the Office Action, adding comments to emphasize the relevance of the Examiner's comments, and highlight one aspect of the inventive and non-obvious nature of the claimed subject matter. To obtain the system claimed from the references, the skilled person would have to

"modify Davis table by including a filter option for the attributes [rather than the items as disclosed by Labarge]. The motivation for doing so would have been to provide the user an option by allowing the user to (select or de-select) the attribute to apply to an entire column, thereby saving time. Saving time because the user doesn't have to go thru every single strip and deselect one by one each marker in that column for that attribute [as the user would have to do if you simply applied the check-box filtering of Labarge to the items in the Davis matrix], instead they could just select the one filter box associated with the attribute".

If the Examiner considers that the motivation to provide an option box is to enable a 'global' setting or clearing of a Labarge-type item-based option box, then that would not lead the skilled person towards the claimed invention. All it would enable a user to do is to show all items or remove all items. Hence the Examiner's motivation seems to be based on a *misrepresentation* or *misunderstanding* of what the option box does in the present application.

In addition to those identified by the Examiner, there are also further distinctions between the invention as claimed and Davis and two of these distinctions are discussed in more detail below.

As with the earlier prior art cited in the previous Office Action, neither document discloses managing a list of items and separate attributes. To emphasize this distinction, the independent claims have been amended to specify that the list of attributes is "external to and independent of" the items, but that they "may be allocated" to the items. That is, the Applicant's invention lists both items and attributes and uses row/column intersections to show where attributes are possessed by items.

In contrast, Davis displays the relationship between one set of items (e.g. a "process") and a second set of items (e.g. an "entity type") and uses row/column intersections to show the possible kinds of interaction between one and the other. Although Davis uses the word "attribute" the things thus described (course number, session presentation sequence number etc) are not attributes in the sense of the application; they are objects. For example, in the system claimed, we can say that an attribute, "wide", is possessed by an item, "Verdana font". In the Davis example (Process/Attribute Matrix on Page 13) it does not make sense to say that the attribute 'room' is possessed by the item 'cancel presentation'.

A further distinction between the claims and the prior art therefore arises. Since Davis does not disclose items and separate attributes that may be possessed by the items, Davis cannot disclose displaying markers in accordance with whether the item named in the crossed row has (or alternatively has not) the attribute associated with that strip.

Instead, in Davis, the row/column intersections hold not markers but a more complex system of different values, which are explained by an additional separate table in the diagram which lists the different actions which can be shown. In Applicant's system, the intersections hold a simple marker, which has only one meaning ("the item has the attribute") and advantageously does not need a separate table to explain it.

In summary, the invention of amended Claim 1 is not rendered obvious by the references and the rejection should be withdrawn.

### *Independent Claim 2*

Independent Claim 2 is drawn to unobvious subject matter at least for the reasons given above in relation to Claim 1. However, for completeness, the Examiner's additional objections to Claim 2 are discussed in more detail below.

There is no disclosure in either Davis or Labarge of providing an attribute strip with a first section containing an identifier of a possible attribute of a data element and a second section comprising a filter option indicator and further comprising attribute marker sections for each data element. This combination of elements is simply not disclosed in reference and it would not be obvious to provide such an arrangement based on Davis and Labarge.

As set out in relation to Claim 1, Davis does not disclose the display of attributes of data elements as claimed and it would not be obvious to provide a filter option based on attributes.

Further, it would not be obvious to provide any filter option in a section of an attribute strip. Even if a skilled person wished to apply a filter to the Davis tables, he would quickly recognize that the complex indicator system of Davis, in which the connection between items is indicated by a multi-tiered system of letters, would require a much more complex filtering

system than the filter option indicator claimed. Hence the skilled person would not add a simple filter option indicator to a section of an attribute strip.

Instead, particularly in view of the teaching of Labarge, the skilled person would be much more likely to apply a more complex system of drop-down menus to filter groups of items.

In summary, no combination of Davis and Labarge would lead the skilled person to the method of Claim 2 and the rejection of Claim 2 should be withdrawn.

*Independent Claim 19*

Independent Claim 19 is drawn to unobvious subject matter at least for the reasons given above in relation to Claim 1. However, for completeness, the Examiner's objections to the additional features of Claim 19 are discussed in more detail below.

The Applicant respectfully disagrees with the Examiner's assertion that Davis discloses using a rectangle formed in the table between the vertical strips and the horizontal rows to allow the user to set the attribute and to accept a mouse click from the user to toggle the attribute on or off for the item.

As set out above, Davis does not disclose any user-interaction with the tables and there is no indication anywhere in Davis that the tables are anything other than a means for displaying data that has been gathered from other sources in a convenient form. There is certainly no disclosure in Davis of accepting a mouse click from a user to toggle an attribute on or off.

Even if we speculate that a user may be able to enter data into the tables disclosed by Davis, due to the nature of the complex relationships between the items in the Davis table, the data entry process would have to be more complex than providing an on/off toggle operated by a mouse-click.

Further, Davis fails to teach allocating a second table for storing as many elements as there are items to be listed, each element containing a pointer to the item, as well as a flag for each attribute in the first table showing whether the attribute is on or off. The additional table in Davis to which the Examiner refers, is simply a key to the main table. The key indicates the meaning of the symbols in the main table, but in no way indicates whether particular attributes are set "on" or "off" for particular items.

In addition, as set out above in relation to Claim 1, no combination of Davis and Labarge could or would lead the skilled person to the filtering methods detailed in Claim 19.

In summary, the invention of amended Claim 19 is not rendered obvious by the references and the rejection should be withdrawn.

#### *Independent Claim 20*

Since independent Claim 20 includes all of the steps or acts of method Claim 2, it is also allowable at least for the reasons set out above with respect to Claim 2, and its rejection should be withdrawn.

#### *Dependent Claims 3-18*

The dependent claims are unobvious and allowable at least by virtue of being dependent on allowable Claim 2. The features of the dependent claims are not discussed in detail herein. However, for the avoidance of doubt, the dependent claims are believed to add further novel and inventive features.

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Art Unit: 2178

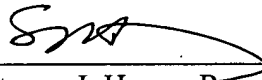
**CONCLUSION**

A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,

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